



November 28, 2005

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: *IP Enabled Services; E911 Requirements for IP-Enabled Service Providers; WC*
Docket Nos. 04-36, 05-196; VOIP E911 Compliance Letter**

Dear Ms. Dortch:

Pursuant to the requirement contained in the Commission's *VOIP 911 Order* released on June 5, 2005 and the *Public Notice* released by the Enforcement Bureau on November 7, 2005, Covad Communications Company ("Covad") provides its letter of compliance with VoIP 911 requirements.¹

Description of Covad's VOIP Services. Covad focuses on providing non-nomadic business-class VoIP services to small and medium-sized businesses nationwide. Covad offers business VoIP services in 125 major metropolitan areas covering 900 cities in 44 states. For the vast majority of its customers, Covad VoIP runs over a private, secure and fully managed network, offering small and medium businesses an unparalleled end-to-end suite of dependable services and voice quality. Covad's business-class VoIP products include vPBX, a fully-hosted "virtual PBX" VoIP service, and PBXi, a premises-based solution that enables the cost savings, flexibility, and functionalities of a fully integrated VoIP solution using a customer's existing PBX, KTS, or IP-PBX equipment base.

Covad is also working with Earthlink in developing and deploying a "Line-Powered Voice" service designed to provide residential consumers with an affordable VoIP alternative to local phone company service. Line-Powered Voice marries the "last mile" of traditional telephone copper wiring with VoIP by taking advantage of next-generation Digital Subscriber

¹ *IP-Enabled Services and 911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245 (2005); *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, Public Notice, DA 05-2945 (rel. Nov. 7, 2005).

Line Access Multiplexer (“DSLAM”) technology. A critical distinguishing feature of Line-Powered Voice is that Covad’s next-generation DSLAMs provide power to customers’ phone lines, and thus the customers’ phone equipment, from the DSLAM/central office, just as traditional phone service provides power. Therefore, in the event of a power outage at a customer’s premises, Line Powered Voice service will continue to be available. Line-Powered Voice will fully support E911.

911 Solution. Covad has always recognized the importance of 911 and incorporated 911/E911 as a fundamental feature as it launched business-class VoIP services. Covad uses turn-key E911 service provided by third-party vendors including Global Crossing, Pac-West, Level 3, and Broadwing. These providers work with the local phone companies and others to update end-user information in industry telephone databases such as E911 and directory listing services.

All of Covad’s current VoIP service offerings are “non-nomadic,” *i.e.*, they are “fixed” and cannot be moved to a different location by customers. Covad has two types of non-nomadic customers: those who get their broadband service from Covad (“managed circuits”) and those who get their broadband service from another provider (“unmanaged circuits”). In the former category, 100% of stations that receive their broadband from Covad are provided with fully compliant E911 services. In the latter category—and despite providing significant resources to the task—Covad does not currently provide 911/E911 service to 4,026 VoIP stations representing 10.64% of our total station count.

Of these 4,026 stations, however, less than 5% (approximately 200 stations) are located in areas where Covad’s vendors lack the numbering resources necessary to provide full E911 functionality. Covad anticipates that it may be able to complete the task of provisioning E911 services to the other 3,826 stations by as early as mid-January 2006 depending the completion of certain engineering tasks, and in any event by the end of the first quarter of 2006. When this effort is completed in the next several months, Covad will be providing full 911 functionality to nearly 99.5% of its stations.

When Covad has completed the engineering effort described above, there will remain some very small number of stations that cannot be provided with 911 services absent the addition by our vendors of phone number inventories in a number of new LATAs. Covad is committed to providing full 911 services to all of our customers as quickly as possible, and we will be closely monitoring developments in this area so that we can add coverage as soon as it becomes available. Based on public announcements by several vendors, Covad expects significantly increased coverage by the middle of 2006.

In this context, it is important to note that Covad is no longer taking any orders for new VoIP stations in areas where Covad cannot ensure full compliance with the *VoIP 911 Order*. Accordingly, the number of Covad VoIP stations that are not able to get 911 services will never get larger and will, in fact, begin to fall as we gain access to 911/E911 solutions in additional areas via our vendors. All of Covad’s customers that have stations that do not currently receive

Covad Communications
VoIP E911 Compliance Letter
November 28, 2005

911 services in compliance with the *VoIP 911 Order* are aware of the limitations and locations of these stations. These stations are located in the following states:

State	Stations Pending E911 Connectivity
Arizona	26
California	2,408
Colorado	45
Connecticut	37
District of Colombia	4
Florida	126
Georgia	91
Illinois	279
Massachusetts	37
Michigan	109
Minnesota	12
Montana	3
Nevada	46
New Jersey	142
New Mexico	9
New York	113
North Carolina	2
Ohio	132
Oregon	19
Pennsylvania	88
South Carolina	2
Texas	157
Utah	7
Virginia	69
Washington	63
Total	4,026

For the nearly 90% of Covad's VoIP stations currently receiving full E911 services, Covad, through its selected third party vendors, transmits VoIP 911 calls to the appropriate public safety answering point ("PSAP"), designated statewide default answering point, or appropriate local emergency authority utilizing the selective router, the trunk line(s) between the selective router and the PSAP, and such other elements of the wireline E911 network as are necessary in those areas where selective routers are utilized. Covad is interconnected, either directly or indirectly, with all selective routers served by its various third party vendors.

Furthermore, Covad, through its selected third party vendors, is transmitting via the wireline E911 network the 911 caller's automatic numbering information ("ANI") and registered location information to all answering points that are capable of receiving and processing this information. Because Covad's network is centered around the nation's largest cities, approximately 100% of answering points within Covad's network service area are capable of receiving and processing ANI and registered location information ("ALI"). In areas where

**Covad Communications
VoIP E911 Compliance Letter
November 28, 2005**

Covad does not have access to telephone numbers but provides VoIP services to one or more stations via unmanaged circuits, this percentage is not known. Covad is sending ALI and ANI information for approximately 100% of its managed stations to answering points capable of receiving and processing this information.

Registered Location Information. Covad has complied with the Commission's requirement to obtain initial registered location information from its current subscriber base. It has done so by forming a special internal task group and by leveraging vendor relationships to help validate E911 routing and location information for all Covad VoIP subscribers. More specifically, Covad and its vendors contacted all Covad VoIP subscribers to verify and/or update fixed location information. This was completed by October 24, 2005. Based upon these initial contacts, any resulting provisioning and testing was completed and any related issues were resolved. The project in its entirety was completed on November 13, 2005. For new Covad VoIP subscribers as of the date of the *VoIP 911 Order*, Covad has collected initial registered location information as part of the service ordering and provisioning process.

Since all of Covad's VoIP services are non-nomadic, all initial registered location information will remain the same, and there is no need for Covad to develop and implement an automated mechanism for allowing its VoIP customers to update initial registered location information. If and when Covad offers a nomadic VoIP service, it will develop and implement an appropriate mechanism to allow for the update of registered location information in compliance with the Commission's requirements.

Conclusion. Covad has devoted its best efforts to ensure that its VoIP customers have 911/E911 access and believes that it has made significant progress toward meeting the Commission's VoIP 911 requirements in the given timeframe. Covad remains committed to obtaining full nationwide compliance as soon as possible.

Please contact the undersigned for additional information or with any questions regarding this matter.

Respectfully submitted,

/s/ Angela Simpson

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Covad Communications
VoIP E911 Compliance Letter
November 28, 2005

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